

Exhibit B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LISA DOMSKI,

Plaintiff,

Case No. 2:23-cv-12023

v.

Hon. David M. Lawson

BLUE CROSS BLUE SHIELD
OF MICHIGAN,

Defendant.

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**PLAINTIFF'S INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Plaintiff LISA DOMSKI, by and through her attorneys, HURWITZ LAW
PLLC, submits the following disclosures pursuant to Fed. R. Civ. P. 26(a)(1).

1. Witnesses.

Plaintiff identifies the following individuals likely to have discoverable information in their possession that Plaintiff may use to support to her claims:

(a) **Plaintiff.** Plaintiff has information about the allegations in the Complaint, including her employment with Defendant. This information may include, but not limited to, her job performance, her qualifications and work experience, and her interactions with Defendant's representatives. Plaintiff may testify about the damages that she has suffered because of Defendant's conduct.

(b) **President, Daniel J. Loepp.** Upon information and belief, Mr. Loepp is a current employee of Defendant. Mr. Loepp has information regarding the factual allegations in Plaintiff's Complaint, Plaintiff's employment with Defendant, Defendant's policies and procedures, and documents that may be produced in this case.

(c) **All individuals in Defendant's Initial Disclosures.**

(d) **Record Keeper for Defendant.** The record keeper for Defendant may testify as to the verification that the records are complete and accurate copies of the originals maintained by the organization and the authenticity of the records.

Plaintiff reserves the right to supplement this list with additional individuals as the discovery process progresses in accordance with Fed. R. Civ. P. 26(e)(1).

2. Documents

Plaintiff may use any of the documents currently in the possession of the individuals listed in Item No. 1 of this document. These documents would include:

- (a) Plaintiff's personnel file;
- (b) Plaintiff's medical records;
- (c) Emails and text messages sent and received by Defendant's agents; and
- (d) Defendant's employment policies and procedures.

Plaintiff reserves the right to supplement this list with additional documents as the discovery process progresses in accordance with Fed. R. Civ. P. 26(e)(1).

3. Damages

Plaintiff cannot at this time submit a computation of damages claimed pending further discovery. Her damages include but are not limited to damages permitted under the Title VII Act and the Elliott-Larsen Civil Rights Act ("ELCRA"); including base salary, healthcare, 401k, life insurance, and other benefits. Plaintiff seeks actual damages for humiliation, emotional distress, and lost wages (including front pay, back pay, and benefits), liquidated damages, punitive damages, compensatory damages, costs, attorney's fees, and all other relief in law or equity that is deemed just and proper.

4. Insurance Agreement

Plaintiff has no knowledge of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Plaintiff reserves the right to supplement these disclosures as further information is learned through discovery in accordance with Fed. R. Civ. P. 26(e)(1).

Respectfully submitted,

HURWITZ LAW PLLC

/s/ Noah S. Hurwitz

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Dated: October 20, 2023

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing, Plaintiff's Initial Disclosures, was served upon the attorney(s) of record for all parties to the above cause on this October 20, 2023 via e-mail to their email addresses at:

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/s/Jessica M. Seal
Jessica M. Seal, Case Manager